

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

Gayle Foltin, et. Al.,	)	
	)	Case No.: 09 C 5237
Plaintiffs,	)	
	)	Judge Lefkow
v.	)	
	)	
Police Officer Ugarte, et. al.,	)	
	)	
Defendants.	)	Jury Demanded

**MOTION TO SUBSTITUTE COUNSEL**

Defendant Police Officer Ugarte (herein referred to as “defendant”) by one of his undersigned attorneys, respectfully requests leave to substitute Andrew Hale, Avi Kamionski and Suyon Flowers of Andrew M. Hale & Associates as counsel of record and to withdraw the appearance of Assistant Corporation Counsel Jonathan Clark Green. In support of this motion, the undersigned states:

1. Plaintiffs filed their Complaint naming several defendants on August 25, 2009.<sup>1</sup>
2. Plaintiffs filed an Amended Complaint on December 4, 2009.
3. Jonathan Clark Green of the Corporation Counsel’s Office represented and currently has an appearance on file for the individual defendant.
4. Defendant Ugarte filed his Answer to the Complaint on October 26, 2009.<sup>2</sup>
5. The undersigned counsels at Andrew M. Hale & Associates were assigned to represent the defendant on March 8, 2010.

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<sup>1</sup> On December 4, 2009, Police Officer Vivncio was terminated from the case. (*See* Doc. No. 17).

<sup>2</sup> On December 4, 2009, the Court ordered that the Answer of Defendant Ugarte shall stand as answer to the amended Complaint. (*See* Doc. No. 19).

6. The undersigned counsels, Andrew Hale, Avi Kamionski, and Suyon Flowers of Andrew M. Hale & Associates seek leave to file their appearance and substitute in as counsel of record on behalf of defendant.

7. Jonathan Clark Green seeks leave to withdraw his appearance.

WHEREFORE, Defendant respectfully requests that Andrew Hale, Avi Kamionski, and Suyon Flowers be given leave to substitute in as counsel of record, and that Jonathan Clark Green be allowed to withdraw his appearance.

Respectfully Submitted,

/s/ Jonathan Clark Green  
One of the Attorneys for Defendant

/s/ Suyon Flowers  
One of the Attorneys for Defendant

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